

# **EXHIBIT A**

## **PARTIES' JOINT CLAIM CONSTRUCTION CHART** **FOR FAMILY 2 PATENTS**

Disputed Claim Term	Patent, Asserted Claims	Plaintiff's Proposed Construction	Defendants' Proposed Construction
"transceiver"	'881 patent, claims 17, 18 '028 patent, claims 1, 2 '706 patent, claims 1, 2 '511 patent, claims 2, 6	"communications device capable of transmitting and receiving data wherein the transmitter portion and receiver portion share at least some common circuitry"  <u>Intrinsic Evidence:</u> Ex. B ('881 patent), Fig. 2. <sup>1</sup>	"communications device capable of transmitting and receiving data"  <u>Intrinsic Evidence:</u> '881 patent, Fig. 1, 2; col. 1:26-56; col. 1:60-2:5; col. 3:58-4:5.
"plurality of bonded transceivers"	'881 patent, claims 17, 18 '028 patent, claims 1, 2	"two or more transceivers configurable to be located on the same side of two or more physical links where each transceiver is configurable to transmit or receive a different portion of the same bit stream via a different one of the physical links"  <u>Intrinsic Evidence:</u> <i>See, e.g.,</i> Ex. B ('881 patent), Figs. 2-12, 1:60 – 2:5, 4:15-18, 4:29-33, 4:52-56, 4:62 – 5:9, and 5:22-67.	"two or more transceivers, each corresponding to a physical link, coordinated to transmit or receive a different portion of the same bit stream via a different one of the physical links" <u>Intrinsic Evidence:</u> '881 patent, Fig. 2; col. 1:42-56; col. 1:60-2:5; col. 2:10-19; col. 3:58-4:38; col. 4:57-5:6; col. 5:44-52; col. 10:54-58; col. 11:31-34.  Ex. F, '881 File History, Examiner's Interview Summary for March 15, 2007.
"combine multiple DSL transceivers"/ "combined multiple DSL"	'706 patent, claims 1, 2 '511 patent, claims 2, 6	"locate two or more DSL transceivers on the same side of two or more physical links where each transceiver is configured to transmit or receive a different portion of the same bit stream"	The preambles of these claims are limiting.  "locate at least two DSL transceivers, each corresponding to a physical link, on the same communications node so that

<sup>1</sup> The '881, '028, '706, and '511 patents share a common disclosure. For brevity, TQ Delta cites only to the '881 patent. Citations to other patents are noted in the charts.

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transceivers”		<p>via a different one of the physical links” / “two or more DSL transceivers configurable to be located on the same side of two or more physical links where each transceiver is configurable to transmit or receive a different portion of the same bit stream via a different one of the physical links”</p> <p><u>Intrinsic Evidence:</u></p> <p><i>See, e.g.,</i> Ex. B (’881 patent), Figs. 2-12, 1:60 – 2:5, 4:15-18, 4:29-33, 4:52-56, 4:62 – 5:9, and 5:22-67.</p>	<p>they are coordinated to transmit or receive a different portion of the same bit stream via a different one of the physical links”/ “at least two DSL transceivers, each corresponding to a physical link, located on the same communications node and coordinated to transmit or receive a different portion of the same bit stream via a different one of the physical links”</p> <p><u>Intrinsic Evidence:</u></p> <p>’881 patent, Fig. 2; col. 1:42-56; col. 1:60-2:5; col. 2:10-19; col. 3:25-39; col. 3:58-4:38; col. 4:62-5:6; col. 5:44-52; col. 10:54-58; col. 11:31-34.</p> <p>’511 patent, col. 11:4-16; col. 11:46-62.</p> <p>Ex. F - ’881 File History, Examiner’s Interview Summary for March 15, 2007.</p>
“utilizing at least one transmission parameter value to reduce a difference in latency between the bonded transceivers”	<p>’881 patent, claims 17, 18</p> <p>’028 patent, claims 1, 2</p>	<p>“to set a value of at least one parameter used for transmission to reduce the difference between the latencies of the respective bonded transceivers”</p> <p><u>Intrinsic Evidence:</u></p> <p>Ex. B (’881 patent), 6:1-16 and 6:56 – 7:36.</p>	<p>“configuring at least one transmission parameter value to minimize the difference in the configuration latencies between the bonded transceivers”</p> <p><u>Intrinsic Evidence:</u></p> <p>’881 patent, Fig. 15; col. 5:23-42; col. 6:1-35; col. 6:56-7:36; col. 10:40-47.</p> <p>Ex. F - ’881 Patent File History – Office Action dated 10/18/2006; Amendment dated 2/28/2007.</p> <p>Ex. G - ’706 Patent File History – Office Action dated 1/10/2011; Amdmt and</p>

Disputed Claim Term	Patent, Asserted Claims	Plaintiff's Proposed Construction	Defendants' Proposed Construction
			<p>Response Dated 2/11/2011.</p> <p>Ex. H - '511 Patent File History – Office Action dated 2/15/2011; Amdmt and Resp. dated 8/11/2011; Office Action dated Nov. 18, 2011; Amdmt dated May 14, 2012</p>
<p>“utilizing at least one transmission parameter value . . . to reduce a difference in latency between the multiple DSL transceivers”</p>	<p>'706 patent, claims 1, 2</p> <p>'511 patent, claim 6</p>	<p>“to set a value of at least one parameter used for transmission to reduce the difference between the latencies of the respective multiple DSL transceivers”</p> <p><u>Intrinsic Evidence:</u></p> <p>Ex. B ('881 patent), 6:1-16 and 6:56 – 7:36.</p>	<p>“configuring at least one transmission parameter value to minimize the difference in configuration latencies between the multiple DSL transceivers”</p> <p><u>Intrinsic Evidence:</u></p> <p>'881 patent, Fig. 15; col. 5:23-42; col. 6:1-35; col. 6:56-7:36; col. 10:40-47.</p> <p>Ex. F - '881 Patent File History – Office Action dated 10/18/2006 ; Amendment dated 2/28/2007.</p> <p>Ex. G - '706 Patent File History – Office Action dated 1/10/2011; Amdmt and Response Dated 2/11/2011.</p> <p>Ex. H - '511 Patent File History – Office Action dated 2/15/2011; Amdmt and Resp. dated 8/11/2011; Office Action dated Nov. 18, 2011; Amdmt dated May 14, 2012</p>
<p>“determining at least one transmission parameter value . . . to reduce a</p>	<p>'511 patent, claim 2</p>	<p>“to determine a value of at least one parameter used for transmission to reduce the difference between the latencies of the respective multiple DSL</p>	<p>“computing at least one transmission parameter value to minimize the difference between the configuration latencies of the multiple DSL</p>

<b>Disputed Claim Term</b>	<b>Patent, Asserted Claims</b>	<b>Plaintiff's Proposed Construction</b>	<b>Defendants' Proposed Construction</b>
difference in latency between the multiple DSL transceivers''		<p>transceivers''</p> <p><u>Intrinsic Evidence:</u></p> <p>Ex. B ('881 patent), 6:1-16 and 6:56 – 7:36.</p>	<p>transceivers''</p> <p><u>Intrinsic Evidence:</u></p> <p>'881 patent, Fig. 15; col. 5:23-42; col. 6:1-35; col. 6:56-7:36; col. 10:40-47.</p> <p>'511 patent, Fig. 16; col. 10:58-11:3; col. 11:42-46.</p> <p>Ex. F - '881 Patent File History – Office Action dated 10/18/2006; Amendment dated 2/28/2007.</p> <p>Ex. G - '706 Patent File History – Office Action dated 1/10/2011; Amdmt and Response Dated 2/11/2011.</p> <p>Ex. H - '511 Patent File History – Office Action dated 2/15/2011; Amdmt and Resp. dated 8/11/2011; Office Action dated Nov. 18, 2011; Amdmt dated May 14, 2012; Office Action dated August 16, 2012; Amdmt dated 9/4/2012.</p>